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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)
Plaintiff,)
vs.)
ANTHONY SULLIVAN,)
Defendant.)
CASE NO. 2:20-CR-00298-GMN-EJY

**STIPULATION TO CONTINUE PLEA HEARING
(First Request)**

IT IS HEREBY STIPULATED AND AGREED, between the United States of America, by and through its attorney, Christopher Chiou, Acting United States Attorney, through Kimberly Sokolich, Assistant United States Attorney; and Defendant Anthony Sullivan, by and through his counsel, Russell E. Marsh, Esquire, Wright Marsh & Levy, that the Change of Plea Hearing currently scheduled for June 16, 2021, be vacated and set to a date and time convenient to this Court, at least two weeks from the current hearing date.

This stipulation is entered into for the following reasons:

1. Case No. 2:20-cr-00298-APG-EJY and Case No. 2:20-CR-00299-GMN-EJY have been consolidated before Judge Navarro under Case No. 2:20-cr-00299-GMN-EJY as to Defendant Anthony Sullivan only. (ECF No. 34.)

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1 2. Plea agreements in both cases having been provided to the Court, these matters are
2 currently scheduled for a Change of Plea Hearing on June 16, 2021, at 9:00 a.m. (ECF No. 64.) A
3 Joint Status Report has been filed, agreeing to proceed by video conferencing. (ECF No. 66.)

4 3. Counsel for both parties have scheduling conflicts on the current date. Mr. Marsh has
5 a hearing that can not be moved at 9:00 a.m. in bankruptcy case number 21-12443-NMC. AUSA
6 Sokolich is scheduled to present a case before the federal grand jury at 10:00 a.m. Because this
7 matter involves two plea agreements, it may take longer than a typical plea hearing.

8 4. The parties agree to continue the Change of Plea Hearing for two weeks. Mr.
9 Sullivan is out of custody and agrees to the continuance.

10 5. Additionally, denial of this request for continuance could result in a miscarriage of
11 justice.

12 6. The additional time requested by this Stipulation is made in good faith and not for
13 purposes of delay.

14 7. This is the first request for a continuance of the Change of Plea Hearing.

15 Dated this 15th day of June, 2021.

16 Respectfully submitted:

17 WRIGHT MARSH & LEVY

19 BY /s/ Russell E. Marsh
20 RUSSELL E. MARSH, ESQUIRE
 Attorney for Defendant Sullivan

CHRISTOPHER CHIOU
ACTING UNITED STATES ATTORNEY

BY /s/ Kimberly Sokolich
KIMBERLY SOKOLICH
Assistant U.S. Attorney

1 UNITED STATES DISTRICT COURT
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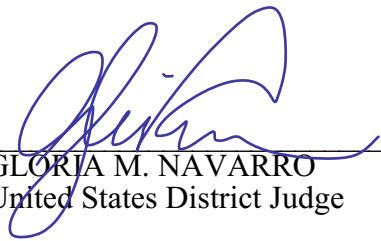
DISTRICT OF NEVADA

4 UNITED STATES OF AMERICA,)
5 Plaintiff,) CASE NO. 2:20-CR-00298-GMN-EJY
6 vs.)
7 ANTHONY SULLIVAN,)
8 Defendant.)

9 Based on the Stipulation of the parties, the Change of Plea Hearing in this matter is hereby
10 continued. The ends of justice served by granting said continuance outweigh the best interest of the
11 public and the defendant in a hearing, since the failure to grant said continuance would be likely to
12 result in a miscarriage of justice, and would deny the parties herein sufficient time and the
13 opportunity within which to be able to effectively and thoroughly prepare for the hearing, taking into
14 account the exercise of due diligence.

15 IS IT HEREBY ORDERED that the Change of Plea Hearing in the above-captioned
16 matter currently scheduled for June 16, 2021, at 9:00 a.m., be vacated and
17 continued to June 30, 2021, at 10:00 a.m. in Courtroom 7D.

18 DATED: June 15, 2021.
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GLORIA M. NAVARRO
United States District Judge
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